

September 18, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Aeronet Global Communications Inc.'s Petition for Rulemaking to Amend the Commission's Allocation and Service Rules for the 71-76 GHz, 81-86 GHz, and 92-95 GHz Bands to Authorize Aviation Scheduled Dynamic Datalinks, RM-11824*

Aeronet Global Communications Inc.'s Petition for Rulemaking to Amend the Commission's Allocation and Service Rules for the 71-76 GHz, 81-86 GHz, and 92-95 GHz Bands to Authorize Maritime Scheduled Dynamic Datalinks, RM-11825

Dear Ms. Dortch:

On behalf of Bahama Paradise Cruise Lines ("BPCL"), I would like to submit the following information concerning the petitions for rulemaking filed by Aeronet Global Communications Inc. ("Aeronet") in the above-referenced dockets.

I am the Vice President of Information Technology ("IT") with BPCL, and I have over twenty-five years of experience in the cruise industry. For years, I have been working on improving on-ship connectivity as the on-board IT Director and Global Business Solutions Manager at Royal Caribbean and, for the last three years, as BPCL's Vice President.

Being able to provide robust connectivity at sea is now critical for cruise ship operations. Both passengers and crew require the ability to stay connected. The industry has been evolving to reflect this new reality, and many cruise lines are now capable of offering data and voice capabilities well beyond what was traditionally possible from ship to shore: Data speeds have increased from 256 kbs to over 500 Mbps as handsets and other technology components have improved.

Nevertheless, passenger and crew demand continues to outstrip what existing technologies can provide—by a significant margin. Cruise lines currently rely on satellite solutions, which, although capable, have limited bandwidth. And the next generation of satellite constellations designed to enhance coverage at sea are still four-to-six years out. There is therefore a significant need for new technologies in the short-to-medium term to provide high-quality, high-speed, throughput to cruise ships at a reasonable cost. Such technologies would afford cruise lines and passengers significant benefits.

To help improve connectivity for our own operations, BPCL has been working with Aeronet to trial its innovative service with crew members to analyze how Aeronet's land-based, point-to-point system performs. The results have been impressive. Specifically, we have seen speed rates that approach 1 Gbps close to shore and are consistent up to twelve miles away. Indeed, based on these results, we are enthusiastically starting the process of expanding our trial with Aeronet to include passengers.

If Aeronet is able to expand its operations, we expect to be able to provide improved services to our passengers and crew, at lower cost—with the savings passed on to our customers. For this reason, we strongly support quick action by the FCC to authorize use of E-Band spectrum to provide high-capacity, low-cost connectivity.

Thank you for your time.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Coombs', with a stylized, flowing script.

Richard Coombs

Vice President, IT, Bahama Paradise Cruise Lines